



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

RCH  
F. #2019R00927

*271 Cadman Plaza East  
Brooklyn, New York 11201*

April 1, 2021

By ECF

The Honorable Brian M. Cogan  
United States District Judge  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: United States v. Ivan Reyes Arzate  
Criminal Docket No. 20-030 (BMC)

Dear Judge Cogan:

The parties respectfully submit this written status update to the Court in the above-captioned matter and to respectfully request that the Court adjourn the upcoming status conference scheduled for April 8, 2021, for 60 days. The government has continued the process of collecting, reviewing and producing discovery to the defendant on a rolling basis, and recently produced more than 80,000 pages of discovery material pursuant to Federal Rule of Criminal Procedure 16. In addition, the parties have continued to engage in plea negotiations during this time period and, on the basis of those negotiations, the government recently provided defense counsel with a proposed plea agreement. Despite this progress, the parties continue to face delays in preparing for a potential trial in this case, in light of the COVID-19 pandemic, including limitations on defense counsel's ability to meet with the defendant and review the discovery materials, as well as the government's ability to continue collecting discovery materials for disclosure and meet with incarcerated witnesses.

The parties respectfully request that the Court adjourn the status conference scheduled for April 8, 2021, for a period of 60 days to permit the parties to focus their efforts on plea negotiations and for the defendant and defense counsel to review the proposed plea

